

WORK ASSIGNMENT NO. 1-03  
NESHAP Subpart W  
WAM: Rosnick

**PURPOSE AND SCOPE**

Under this Work Assignment WA, SC&A will provide technical and regulatory support to the EPA Office of Radiation and Indoor Air to develop a potential rulemaking to update the NESHAP Subpart W standard for radon emissions from operating uranium mill tailings impoundments which was promulgated on December 15, 1989 (40 CFR 61.250). Subpart W includes two separate standards. First, existing sources must ensure emissions from tailings impoundments do not exceed 20 pCi/m<sup>2</sup>-sec of radon-222. Second, new sources must comply with the requirements for constructing one of two types of impoundment structures. Subpart W requires that existing sources file an annual report of the facilities' emissions. These sites include the mills regulated by the NRC and its Agreement States.

Section 112(q) of the Clean Air Act, as amended, further requires EPA to review, and if appropriate, revise or update the Subpart W standard on a timely basis (10-year interval). To date, EPA has not revisited this standard since its promulgation and now desires to do so. The purpose of this Work Assignment is to provide follow-on contractor support for the development of a draft Background Information Document (BID) to support EPA's rulemaking effort to determine if modification of Subpart W is warranted.

**TECHNICAL STATUS**

*Progress Made During Period:*

EPA communicated that the revision to the WA to add the EIA was formally withdrawn and would be incorporated in a new WA to do the EIA as a separate action. Therefore, SC&A suspended any action on the EIA until the new WA is issued.

SC&A has continued its efforts on the drafting of the BID document chapters during July in accordance with the WA scope of work.

SC&A completed its efforts to review the status on the Shootaring Canyon mill site and reported it to the WAM. SC&A reported that, given the current status, an earlier report (8/09) on mill and licensee status did not warrant update or revision at this time.

*Difficulties Encountered and Remedial Action Taken:*

None.

*Anticipated Activity Next Period:*

SC&A will initiate development of the QAP as called for in the original scope of work, now that EPA has decided not to include the EIA in this effort.

SC&A will continue research and drafting on the BID document.

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*Schedule of Deliverables Next Period:*

None anticipated during August.

**OUTSTANDING ACTIONS AWAITING CONTRACTING OFFICER AUTHORIZATION**

None.

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<b>OVERALL FINANCIAL INFORMATION</b>				
	<b>Current</b>		<b>Cumulative</b>	
	<b><u>Hours</u></b>	<b><u>Amount</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
Amount Claimed	29.5	\$3,986.32	137.5	\$18,568.10
Amount Shown on Work Plan			362.0	\$45,366.00
Amount Paid				\$14,581.78
Amount Suspended				\$0.00
Amount Disallowed				\$0.00
Remaining Amount			224.5	\$26,797.90
Unbilled Allowable Costs		\$0.00		\$0.00
Labor Estimates for Next Period			65.0	\$8,100.00
Estimate to Complete			224.5	\$26,797.90
Estimated Percentage of Completion, based on LOE				38%

<b>LABOR SUMMARY</b>									
		<b>Current</b>		<b>Cumulative</b>		<b>Negotiated (Work Plan)</b>		<b>Remaining</b>	
		<b><u>Hours</u></b>	<b><u>Costs</u></b>	<b><u>Hours</u></b>	<b><u>Costs</u></b>	<b><u>Hours</u></b>	<b><u>Costs</u></b>	<b><u>Hours</u></b>	<b><u>Costs</u></b>
P4	SC&A	28.50	3,842.68	129.50	17,530.66	350.00	43,006.00	220.50	25,475.34
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P3	SC&A	1.00	98.49	8.00	787.94	12.00	1,088.00	4.00	300.06
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P2	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Technician	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clerical	SC&A	1.00	45.14	5.50	248.28	16.00	983.00	10.50	734.72
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total		29.50	3,986.31	137.50	18,566.88	362.00	45,077.00	224.50	26,510.12
<b>Average Hourly Rate (Labor)</b>					<b>\$135.03</b>		<b>\$124.52</b>		

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<b>ODC DETAIL INFORMATION</b>		
<b>Item</b>	<b>Current</b>	<b>Cumulative</b>
Publications/Subscriptions	\$0.00	\$0.00
Computer Supplies/Usage	\$0.00	\$0.00
Meetings/Travel	\$0.00	\$0.00
Supplies/Materials	\$0.00	\$0.00
Reproduction/Graphics	\$0.00	\$1.07
Telephone/Fax	\$0.00	\$0.00
Typing/Clerical	\$0.00	\$0.00
Postage/Delivery	\$0.00	\$0.00
Other	\$0.00	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>	<b>\$1.07</b>
Sub ODCs	-	-
Burden on ODCs (including Sub ODCs)	\$0.00	\$0.15

<b>WORK HOUR DETAIL THIS PERIOD</b>		
	<b>Name</b>	<b>Hours</b>
P-4 Labor	A. Zeitoun	2
	H. Pettengill	18
	L. Skoski	9
P-3 Labor	L. Loomis	1
P-2 Labor	None	-
P-1 Labor	None	-
Technician Labor	None	-
Clerical Labor	Clerical	1